town to appoint a commission for establishing building lines. (1917 CONN. SP. LAWS, p. 827.) No compensation for the abutting owner was provided. The defendants disregarded a building line so established. *Held*, that the statute is constitutional. *Town of Windsor* v. *Whitney*, 111 Atl. 354 (Conn.).

For a discussion of the principles involved in this case, see NOTES, p. 419, *supra*.

CONSTITUTIONAL LAW — DUE PROCESS OF LAW — STATUTE PLACING LIABILITY UPON OWNER OF AUTOMOBILE FOR INJURIES CAUSED BY NEGLIGENT OPERATION BY IMMEDIATE MEMBERS OF FAMILY. — The plaintiff sued for damages for injuries sustained through the negligent operation of defendant's automobile by his minor son. A statute provided that the owner of any automobile shall be liable for any injury caused by its negligent operation with the express or implied consent or knowledge of the owner. And that in event of its being driven at the time of the injury by an immediate member of the owner's family, his knowledge or consent shall be conclusively presumed. (1915, MICH. PUB. ACTS, No. 302, § 29.) The defendant offered evidence that the automobile was being driven without his knowledge and contrary to his express orders. The trial court excluded the evidence. *Held*, by an evenly divided court, that the statute is constitutional. *Hawkins* v. *Ermatinger*, 179 N. W. 249 (Mich.).

Powers to effectuate legitimate purposes of government, not delegated to the United States, reside in the states. Included is the so-called "police power," necessary to secure the health, safety, and welfare of their inhabitants. Any exercise of this power by a statute reasonably designed to accomplish its purpose, in a way not outrageous, is constitutional. For a judicial standard of reasonable appropriateness in the circumstances is really all that is required by the due process clause and similar language in state constitutions. It is clear that in Michigan, the home of the automobile industry, with one automobile in 1919 to every twelve inhabitants, adequate protection requires strict motor traffic regulation. And it is equally obvious that the statute in this case has a decided tendency to effect this result. The division of the court can only be explained by a unanimous decision in 1913 which declared unconstitutional a statute placing liability upon the owner for any injury caused by the negligent operation of his automobile, except where it had been previously stolen. *Daugherty* v. *Thomas*, 174 Mich. 371, 140 N. W. 615. Inasmuch as that statute was just as obviously constitutional as this one, we note with approval the rapidly improving attitude of the Michigan Supreme Court.

CONSTITUTIONAL LAW — POWER OF LEGISLATURE — CONTROL OF JUDICIAL PROCEDURE BY LEGISLATURES. — The rules of the Supreme Court of Indiana required the briefs of counsel to contain a concise statement of so much of the record as presented every error and exception relied upon. The State Legislature abolished this rule. *Held*, that the act was void. *Epstein* v. *State*, 128 N. E. 353 (Ind.).

For a discussion of this case, see NOTES, p. 424, *supra*.

CONSTITUTIONAL LAW — STATE AND FEDERAL JURISDICTION — POWER OF A STATE TO SUBJECT FEDERAL AGENCIES TO STATE POLICE REGULATIONS. — A Maryland statute made it a crime to operate a motor vehicle in Maryland without obtaining a license by submitting to examination as to competency to drive and by paying a fee of three dollars. An employee of the United States Post Office was convicted and fined for operating a government mail truck without having obtained such a license. *Held*, that the judgment be reversed. *Johnson* v. *Maryland*, U. S. Sup. Ct., October Term, 1920, No. 289.